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Attorneys for The Trump
Defendants

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

-----X
IN RE:

DONALD J. TRUMP CASINO
SECURITIES LITIGATION --
TAJ MAHAL LITIGATION
-----X

HON. JOHN F. GERRY
MDL DOCKET NO. 864

NOTICE OF MOTION
RETURNABLE MARCH 20, 1992

PLEASE TAKE NOTICE that upon the annexed affidavit of Richard L. Posen, the exhibits attached thereto, the accompanying memorandum of law, and all papers previously filed and proceedings held herein, the Trump Defendants in this action will move, pursuant to Rules 9 and 12, Fed. R. Civ. P., before the Honorable John F. Gerry, United States District Judge, in Room 305 of the United States Courthouse, 401 Market Street, Camden, New Jersey 08101, on March 20, 1992 at _____, or as soon thereafter as counsel can be heard, for an order, substantially in the form submitted herewith: (1) dismissing the complaint in its entirety and with

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prejudice; and (2) granting such other and further relief as the Court may deem just and proper.

Dated: January 28, 1992

CLAPP & EISENBERG

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TO: Counsel of Record